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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

STEVEN L. STANLEY,

Plaintiff,

v.

COMMUNITY DEVELOPMENT
PARTNERS (CDP) - ERIK PAINE; KYLE
PAINE; BRADFORD LONG; GUARDIAN
MANAGEMENT, LLC,

Defendant.

Case No. 3:21-CV-193-MO

**DECLARATION OF COURTNEY B.
McFATE IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' SECOND FED. R.
CIV. P. 12 MOTIONS**

I, Courtney B. McFate, declare as follows:

1. I am an attorney with Lane Powell PC, attorneys of record for Plaintiff Steven L. Stanley. I have personal knowledge of the facts set forth herein. I make this declaration in support of Plaintiff's Opposition to Defendants' Second Fed. R. Civ. P. 12 Motions.

2. Plaintiff filed his Amended Complaint ("Complaint") on April 27, 2021.

3. This handwritten Complaint was prepared without the assistance of counsel.

4. On May 12, 2021, Defendants Community Development Partners (CDP), Erik Paine, Kyle Paine, Bradford Long, and Guardian Management, LLC filed their Second Fed. R.

Civ. P. 12 Motions, including motions to dismiss for failure to state a claim upon which relief can be granted under Fed. R. Civ. P. 12(b)(6), and motions to strike under Rule 12(f).

5. On May 13, 2021, Lane Powell PC filed its notice of appearance on behalf of plaintiff.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on July 1, 2021 in Portland Oregon.

s/ Courtney B. McFate

Courtney B. McFate